HUMAN RIGHTS POLICY
(the "**Policy**")

1. PURPOSE

Orla Mining Ltd. (the "**Company**") and its subsidiaries are committed to respecting the human rights of all individuals impacted by its operations, including the communities and Indigenous Peoples and the Company's employees, contractors, consultants, and other stakeholders. This Policy sets out the Company's commitment to human rights and seeks to integrate human rights best practices into the Company's management, business relationships, governance structures and programs.

2. APPLICATION

This Policy applies to all directors, officers, employees, contractors, consultants and third parties acting on behalf of the Company.

3. POLICY

As part of the Company's commitment to responsible corporate citizenship, the Company recognizes its responsibility to respect human rights in all of its business activities. Therefore, the Company shall:

- Support and respect internationally recognized human rights as proclaimed by the International Bill for Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The Company shall always strive to align its actions with the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact and the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises.

- Conduct human rights due diligence for any new project and in connection with a significant modification to an existing operation, in cases where there is the potential for a negative impact to human rights, especially in high-risk jurisdictions.

- Integrate human rights into its business practices and processes that inform its decision-making, including standards and procedures that promote human rights due diligence and risk assessments. The Company does not tolerate threats, intimidation or attacks against human rights defenders.

- Within the context of the Company's own activities, business relationships and value chains, avoid causing or contributing to adverse human rights impacts and address such impacts if and when they occur.

- Not discriminate against any individual based on race, religion, ethnicity, national origin, colour, gender, age, sexual orientation, citizenship, marital status, pregnancy, disability or any other legally protected characteristic unrelated to an individual's job performance.

- Respect human rights related to working conditions, a safe and healthy workplace, employee privacy, freedom of association, speech and collective bargaining, maximum working hours, minimum wages, accommodation, equal and decent pay, and equal opportunity.

- Prohibit any form of child, forced or compulsory labour, slavery or servitude across its operations, value chains and other business relationships.

- Respect the legal rights of communities, including the right to security and health, cultural heritage, use of land and natural resources, and the right to safe water and a healthy environment.

- Engage with Indigenous Peoples respecting their cultural traditions, collective rights and right to self-determination.

- Engage and respond to stakeholder concerns, contribute to stakeholder-led development initiatives to aid in the attainment of their human rights, and solicit input and feedback related to the Company's human rights management approach and performance.

- Establish confidential grievance and whistleblower mechanisms for stakeholders, including Indigenous Peoples, to submit and resolve complaints related to human rights matters.

- Require private security providers to use competent and appropriately trained personnel with an understanding of security-related human rights issues.

This Policy does not supersede applicable laws and regulations in the jurisdictions in which we operate; rather, it is intended to describe our commitment to the protection of human rights and the prevention of human rights abuses.

4. ADMINISTRATION

The *Environmental, Sustainability, Health and Safety Committee* of the Company (the "**Committee**") is responsible for governance over the commitments made in this Policy. The Committee shall review this Policy on an annual basis to ensure it remains relevant.

All directors, officers, employees, contractors and relevant business partners at every site we operate are required to acknowledge that they have read this Policy upon hiring and annually.

If you have questions about the interpretation of this Policy, please contact the Chief Sustainability Officer of the Company.

5. APPROVAL

ADOPTED AND APPROVED BY THE ENVIRONMENTAL, SUSTAINABILITY, HEALTH AND SAFETY COMMITTEE AND THE BOARD OF DIRECTORS OF ORLA MINING LTD. – AUGUST 3, 2023.

AMENDED AND APPROVED BY THE ENVIRONMENTAL, SUSTAINABILITY, HEALTH AND SAFETY COMMITTEE AND THE BOARD OF DIRECTORS OF ORLA MINING LTD. – NOVEMBER 11, 2025.